

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

<b>In re:</b>  <b>Lamont D. Henry</b>  <b>Debtor</b>  <b>Nations Lending Corporation</b> <b>Movant</b> <b>v.</b> <b>Lamont D. Henry</b> <b>Debtor/Respondent</b>  <b>Kenneth E. West</b> <b>Trustee/Respondent</b>	<b>Bankruptcy No. 20-10598</b>  <b>Chapter 13</b>
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**CREDITOR’S CERTIFICATION OF DEFAULT**

I, Michelle L. McGowan, Esq., attorney for Nations Lending Corporation, (“Plaintiff”), certifies as to the following:

1. I am an attorney for Nations Lending Corporation, and am duly authorized to make this certification.
2. On November 27, 2020 and (DE 44) (“Stipulation”) and November 30, 2020 Order Approving Stipulation (DE 45) was entered, which required the Debtor to make certain payments to Plaintiff to cure specified arrearages maintain future accruing payments. See Composite Exhibit “A”..
3. On May 5, 2023 Plaintiff, by counsel, served on Debtor(s), Debtor(s)’ counsel, and the Trustee a Notice of Default setting forth that Debtor(s) were in default in the provisions of the Stipulation. See Exhibit “B”.
4. The May 5, 2023 Notice of Default stated that the sum of \$21,036.00 was needed from

Debtor(s) to cure the default.

5. The Notice of Default advised that if either the Debtor(s) or the Trustee did not, within fifteen (15) days of the service of the Notice of Default, either cure the default, file an Objection stating that no default exists, or file an Objection stating any other reason why a relief Order should not be entered, Plaintiff could submit a Certification stating that it has complied with the notice requirements of the Order and that the Court may grant relief from the automatic stay without further notice to Debtor, and that, if granted such relief, the real property located at 1910 Carter Rd Folcroft, PA 19032 may be sold at foreclosure.
6. Neither the Debtor(s) nor the Trustee has cured the default, filed an objection with the Court stating that no default exists, or filed an objection with the Court stating any other reason why an order granting relief from the automatic stay should not be entered.
7. That, in accordance with the terms of the Order Approving Stipulation entered on November 30, 2020. Plaintiff is entitled to relief from the automatic stay as to the real property located at 1910 Carter Rd Folcroft, PA 19032,

Date: July 10, 2023

**Robertson, Anschutz, Schneid & Crane  
LLC**

By: /s/ Michelle L. McGowan

Michelle L McGowan, Esq.

Robertson, Anschutz, Schneid, Crane &  
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Attorney for Movant

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on July 10, 2023, the foregoing Certificate of Default was filed with the Clerk of Court by using the CM/ECF system, and a true and correct copy has been served via CM/ECF or to the following parties:

Brad J. Sadek  
Sadek and Cooper  
1500 JFK Boulevard  
Ste 220  
Philadelphia, PA 19102

Lamont D Henry  
1910 Carter Rd  
Folcroft, PA 19032

Kenneth E. West  
Office of the Chapter 13 Standing Trustee  
1234 Market Street - Suite 1813  
Philadelphia, PA 19107

United States Trustee  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
Suite 320  
Philadelphia, PA 19107

**Robertson, Anschutz, Schneid & Crane  
LLC**

By: /s/ Michelle L. McGowan

Date: July 10, 2023

Michelle L McGowan, Esq.

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**ORDER OF COURT**

AND NOW, this \_\_\_\_ day of \_\_\_\_\_, 2023, upon consideration of Nations Lending Corporation's Motion for Relief from Automatic Stay, pursuant to 11 U.S.C. § 362(d) **{IF CO-DEBTOR INSERT: and 11 U.S.C. § 1301}**, any response thereto and that it is not necessary for an effective reorganization, it is hereby

ORDERED, that the automatic stay provisions of Section 362 of the Bankruptcy Code are hereby unconditionally terminated with respect to Nations Lending Corporation; and it is further

ORDERED, that Nations Lending Corporation, its successor and/or assigns are entitled to proceed with appropriate state court remedies against the property located at 1910 Carter Rd Folcroft, PA 19032, including without limitation a sheriff's sale of the property.

**BY THE COURT**

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**HON. Judge Magdeline D. Coleman**  
**U.S. Bankruptcy Court Judge**